



Surveillance Impact Report

GPS Electronic Monitoring
Adult Probation

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology (“COIT”) and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department’s use of GPS Electronic Monitoring, (hereinafter referred to as “surveillance technology”).

PURPOSE OF THE TECHNOLOGY

The Department’s mission is to achieves excellence in community corrections, public safety, and public service through the integration of evidence-based practices and a victim-centered approach into our supervision strategies

The surveillance technology supports the Department’s mission and provides important operational value in the following ways:

Use of Electronic monitoring (EM) allows clients on supervision to comply with the law, empowers them to make positive changes in their lifestyle while living freely in the community, reduces the likelihood of reoffending, assists them in successful completion of probation and protects the public.

The Department shall use the surveillance technology only for the following authorized purposes:

Authorized Use(s):

- ADP clients can be placed on electronic monitoring in San Francisco based on: (a) Court order; (b) Statutory requirement for sex offender that scored 6 or above in DOJ Static-99R (1202 PC) or (c) As condition of probation determined by ADP for Post-Release Community Supervision (PRCS) cases.
- Electronic monitoring (“EM”) may also be added as a condition of probation if additional supervision is warranted. EM data is analyzed on a daily basis by probation officers to ensure compliance with: (a) Curfews; (b) Inclusion zones: addresses/areas where the client has approval to be present, for example their home, school, work; (c) Exclusion zones: addresses/areas where the client should not be present, including Stay Away orders; (d) Schedules: To monitor program participation, work;

Surveillance technology may be deployed in the following locations, based on use case:

- San Francisco County, Bay Area and other neighboring Counties.

Description of Technology

Surveillance Oversight Review Dates

PSAB Review: Recommended: 10/28/2022

COIT Review: TBD (list all dates at COIT, and write “Recommended: MM/DD/202X” for rec date)

Board of Supervisors Approval: TBD

This is a product description of the technology:

All of Vendor's equipment is FCC certified. LOC8 XT is small, lightweight GPS device used to track client movements 24/7. The LOC8 XT uses GPS, RF, Wi-Fi, and LTE cellular technologies to pinpoint the exact location of the monitored client. The LOC8 XT battery is sealed inside the device. To recharge the battery, the client places a wireless charger on the LOC8 XT. The LOC8 XT incorporates field replaceable and adjustable strap that securely fits around the client's leg. The device incorporates tamper detection technologies.

The LOC8 XT tracks client locations and movements in the community in near real time XT reports its collected data to the monitoring computer system and notification when violations occur.

This is a description of how the technology works:

The electronic monitoring consists of placing FCC-certified ankle bracelets (LOC8 XT) on participants that monitor location through global positioning system (GPS) technology. At least once per minute, 24/7, the bracelets transmits location information via the cellular network to a monitoring center. The information is compared with the court ordered curfew schedule and/or inclusion/exclusions zones. The Vendor provides web application for ADP to access the monitoring data.

Third-Party Vendor Access to Data

All data collected or processed by the surveillance technology will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by the Vendor to ensure the Department may continue to use the technology.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

Benefit	Description
▪ Education	

	Community Development	
	Health	
	Environment	
X	Criminal Justice	EM/GPS technology allows ADP to monitor clients' compliance with stay away orders thus ensuring the safety of residents and the community.
	Jobs	
	Housing	
X	Other: Public Safety	EM/GPS technology allows ADP to monitor clients' compliance with stay away orders thus ensuring the safety of residents and the community.

B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

The Department has considered the potential civil rights/liberties impacts associated with the surveillance technology and has identified administrative, technical, and physical safeguards to mitigate these impacts through responsible technology and data use policies and procedures. APD utilizes electronic monitoring only as ordered by the Court for authorized use cases, statutory requirement for sex offender and as condition of probation determined by ADP if additional supervision is warranted.

The administrative safeguards are the following: the department's Probation Officers are trained on how to install, removed, activate, and deactivate an Electronic Monitor. All Probation Officers are trained on how to navigate web application prior accessing the system/technology. The Division Director and Supervising Probation Officer will be responsible for enforcing the Surveillance Technology policy through its incorporation into the overall Department's Supervision Policy. All Probation Officers will be trained on the Surveillance Technology policy. Violation of the policy will be subject to standard ADP's departmental policies, which may include disciplinary action up to and including termination.

The technical safeguards are the following: The centralized monitoring computer system incorporates a variety of security protocols to protect the overall system and to ensure that only authorized personnel access client and program data.

Login and PIN authentication ensure that only authorized individuals access monitoring data. The EM software platforms include various levels of security that comply with National Institute of Standards and Technology (NIST) security standards, including data encryption, protocols for password expiration, maximum login attempts, and forgotten passwords. Access to the system is strictly controlled and restricted through the defined roles.

Vendor's Systems Administration Department utilizes a series of automated systems and platform checks to detect anomalies in the system, and all log data is captured to a logging server. Critical systems are contained in security-controlled computer rooms. To ensure internet communications remain secure, digital certificates and the Transport Layer Security (TLS) protocol are being used.

The physical safeguards are the following: All hardware is stored at Adult Probation's secure location.

C. Fiscal Analysis of Costs and Benefits

The Department's use of the surveillance technology yields the following business and operations benefits:

	Benefit	Description
	Financial Savings	
X	Time Savings	Having this technology available enhances the efficiency of supervision and decrease the reliance on other agencies.
	Staff Safety	
X	Data Quality	Electronic data enhances the accuracy and efficiency of collected data.
	Other	

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

Number of Budgeted FTE (new & existing) & Classification	Technical support is provided by vendor. ADP does not have FTEs dedicated to support this technology.	
	Annual Cost	One-Time Cost
Total Salary & Fringe	N/A	0
Software	N/A	0
Hardware/Equipment	\$115,170.00	0
Professional Services	\$65,853.00	0

Training	N/A	0
Other	N/A	0
Total Cost	\$181,023.00	0

The Department funds its use and maintenance of the surveillance technology through the General Fund.

COMPARISON TO OTHER JURISDICTIONS

The surveillance technology is currently utilized by other governmental entities for similar purposes.

Other government entities have used the surveillance technology in the following way: This technology allows clients on supervision to comply with the law, empowers them to make positive changes in their lifestyle while living freely in the community, reduces the likelihood of reoffending, assists them in successful completion of probation and protects the public.

The effectiveness of the surveillance technology while used by government entities is determined to be the following: This technology has been in use for over 20 years and widely used in US and other countries.

There have not been adverse effects of the surveillance technology while it has been used by other government entities.